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12 UNITED STATES BANKRUPTCY COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 **In re:** **Case No. 14-40186 RLE**

15 **CATHY RAE BOOTH,** **Chapter 13**

16 **Debtor.** **MOTION TO MODIFY CHAPTER 13 PLAN**

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18 The above-named debtor applies to the court for an order to modify
19 her Chapter 13 Plan as follows:

20 1. The balance on hand being held by the Chapter 13 trustee should
21 be disbursed to pay the claims of Quantum3 Group, LLC/MOMA Funding LLC,
22 claim #1, Becket & Lee, LLP, claim #2, and PRA Receivables Management,
23 claim #3, 100%.

24 2. The excess funds leftover after the claims 1, 2, & 3 have been
25 paid in full shall be sent directly to the debtor.

26 The modification is sought on the following grounds:

On January 28, 2016 Select Portfolio Servicing obtained relief
from the automatic stay and shortly thereafter returned a check that
they received from the Chapter 13 trustee with a letter indicating

1 that they obtained relief from the automatic stay. The trustee does
2 not automatically cease payments to the secured creditor absent an
3 Objection to Claim and a Motion to Modify Plan. Debtor is filing a
4 Motion to Modify Plan herewith.

5 Dated: October 23, 2017

6 /s/ Patrick L. Forte

7 PATRICK L. FORTE

8 Attorney for Debtor

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